



THE LEAGUE  
OF WOMEN VOTERS  
OF TENNESSEE

2012 Twenty-First Avenue South, Nashville TN 37212 615/297-7134

November 15, 2001

Mr. James L. Connaughton, Chair  
Council on Environmental Quality  
17th and G Streets, NW  
Washington, DC 20503

Re: Federal Register 66, 43, 586-587

Dear Mr. Chairman:

The League of Women Voters of Tennessee supports energy conservation as important, guiding principle in state and national energy policy, along with safeguards to protect public health and the natural resources. Although a member of our state's Clean Air Task Force, we became aware only recently of your call for public comment on directives for a national, inter-agency energy task force.

The League of Women Voters of Tennessee has been concerned with energy and related issues for many years. The League serves on the Advisory Committee to our own state's interagency Energy Policy Work Group, both of which were created this year through Executive Order of the Governor of Tennessee. We would therefore appreciate the opportunity to share some comments for your consideration in the national task-force effort. We hope that you can still accept these comments.

Principally, we note that energy consumption patterns, very high in Tennessee, are beyond actual "need" in many parts of the country, and far beyond what available efficiency technology could help the nation achieve in energy saving. As only one example of immediately achievable energy saving, we bring to your attention an energy-efficiency retrofit project by a federal facility, the Mountain Home, James H. Quillen VA Medical Center in Johnson City, TN. The project was completed in June of this year under a federal, Enhanced-Use initiative. As result of retrofit to high-efficient lighting alone, the facility's near 30 percent energy savings make up for the full annual electricity needs of 260 average residential homes in this community. [Through this and other modernization measures, it also achieved 5-15 million dollars in recurrent cost savings, more than 35 million dollars in capital cost savings, and a more reliable, electric power capacity.]

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This example of one facility's transformation from an energy wasteful to an energy efficient system illustrates what scientists have been predicting for some time, i.e. that as much as half of the nation's energy growth needs could be met through widespread implementation of efficiency technology now available.

The League of Women Voters of Tennessee therefore questions the premise suggested in the above-referenced FR Notice, of urgency to expedite and accelerate new energy production projects. Instead, waste reduction should be the principal and immediate focus of energy initiatives and should be applied in all relevant sectors (e.g. electricity, appliances, transportation). With ample evidence that energy conservation is readily achievable without loss of productivity, we recommend that conservation measures be explored and promoted by the national task force. We believe that conservation of energy guarantees the greatest economic, strategic, and environmental benefits to the nation.

We believe that new energy production from renewable sources should be given preferential consideration by the task force. Vulnerability to supply and other disruptions by conventional power projects now makes strong support for decentralized, local, and renewable-source energy a safety-related and strategic, national-investment imperative.

The League of Women Voters of Tennessee strongly urges exploration and promotion of wind, fuel-cell, solar and other renewable energy sources. These should be given high priority over non-renewable sources, both to meet new demand where it cannot be covered through efficiency gains, and to allow speedier phase-out of "grand fathered" and other, inefficient energy plants and technologies.

In light of unresolved, national disposal problems for radioactive waste, and in the face of serious safety issues involving nuclear facilities, the League urges minimization rather than enlargement of power supply from nuclear-plant sources.

We are concerned that heightened emphasis, which the language of the FR Notice suggests, to "streamline" and "speed" the permitting of new energy projects, not abrogate or lessen opportunity for public participation. The League believes that public understanding and cooperation are essential to wise decisions on energy and management of the natural resources. We applaud our own state government for inclusion of citizen groups in its energy-policy deliberations and urge the national task force, led by the

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Council, to assure broad citizen input and participation as well. Any new permitting procedures for energy-development projects, which the task force may consider should include mechanisms for public participation, as well as provision for citizen appeal. The League of Women Voters of Tennessee believes that, in vital resource matters, due process right for both the affected public and private parties must be assured in policy.

We support, in general, the more extensive comments and recommendations submitted to you recently on behalf of the Clean Air Task Force, by Ann Brewster Weeks. We thank you for considering as well, our brief comments.

Sincerely,

A handwritten signature in cursive script that reads "Frances Lamberts".

Frances Lamberts, Natural Resources  
League of Women Voters of Tennessee

P.C. Sharon Fidler, President, LWV-TN